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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

CLERK
U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

-----x Chapter 11
In re: Case no 17-12560(BLS)

WOODBIDGE GROUP OF COMPANIES, LLC et al.

Remaining Debtors ,

MICHAEL GOLDBERG, in his capacity as
Liquidating Trustees of the WOODBRIDGE
LIQUIDATION TRUST ,

Plaintiff,

Vs.

NAA INSURANCE AGENCY GROUP, CORP.

-----x

DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR DEFAULT

Defendant NAA INSURANCE AGENCY, CORP, by the undersigned, files this opposition to the Plaintiff's Motion for Default Judgment in this action.

1. At the outset I apologize for the late response and ask that this motion be adjourned to permit us sufficient time to retain counsel to formally oppose this motion. Further in that connection I note that we only just received this paperwork, as we have been away from the office in celebration of our Jewish Passover Holiday during most of operative period for this Motion.

2. As for a matter of substance, not having heard from anyone for over the last year from when our attorneys sent their prior emails, copies of which are attached hereto and made part hereof as Exhibit 'A' , we were under the impression that the said emails constituted our written answer, objection and denial to the claims made against our company by Plaintiff, and that if there was any issue in that regard that we

would be permitted at least 30 days prior notice to retain counsel and provide a more formal defense. Up until now we had no further communication from Plaintiff regarding this matter.

3. There is strong merit to our defense and opposition and we will likely succeed on the merits of this case.. Among other things, we believed in good faith that the earlier email exchange on our behalf would have been entered into Plaintiff's and the court's records as some form of appearance and general denial.

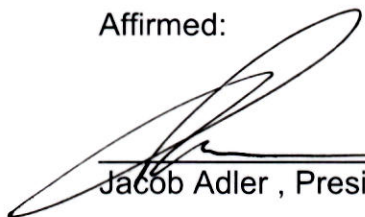
4. Of material significance and in support of our position, any claims or demands made against our company are fully denied as all of the particular transactions in question relating to our company were duly authorized and consented to by prior courts all as evidence by prior court orders.

5. Having secured court orders prior to our company entering into the particular transactions in question on its face there is a clear demonstration and evidence that there is nothing here to support any claim of improper business dealings whether by claim of fraudulent intent or otherwise.

6. I have read this Opposition and know the contents hereof. The same is true to my knowledge, except those matters therein which are stated to be alleged on information and belief, and as to those matters we believe them to be true. This Affirmation is made by me instead of a sworn statement as our religious observances prevent us from swearing to any document.

WHEREFORE Defendant NAA INSURANCE AGENCY, CORP hereby requests that Plaintiff's Motion for a Default be denied in its entirety, at this time.

Affirmed:



Jacob Adler , President

Spring Valley, New York
April 6, 2021

Exhibit "A"

-----Original Message-----

To: acaine@pszjlaw.com <acaine@pszjlaw.com>

Sent: Wed, Jul 15, 2020 7:21 am

Subject: Fwd: In Re Woodbrige Group of Companies - USBC , District of Delaware / Case no 17-12560 (KJC)

I

Dear Mr. Caine:

I write without prejudice and with reservation of rights. My client sent me some paperwork they received via mail from your office advising that a default judgment proceeding had been commenced against Adler's Insurance dba NAA Insurance Agency in the above referenced bankruptcy proceeding..

It was thought that my earlier email exchange would have been entered into your and the court's records as some form of appearance and general denial , to the effect that any claims or demands made against my client were fully denied as all of the particular transactions in question relating to my client were duly authorized and consented as evidence by prior court orders. Respectfully it seems to me to be dispositive , that by my client having secured court orders prior to entering into the particular transactions in question on its face there is a clear demonstration and evidence that there is nothing here to support any claim of improper business dealings whether by fraudulent intent or otherwise.

<https://mail.aol.com/webmail-std/en-us/PrintMessage>

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Notwithstanding, as an accommodation my client is willing to pay Five Thousand (\$5,000.00) dollars as a lump sum in full and final settlement of this matter. And in the event that the parties are not able to resolve this matter at this time then I am writing to request a 30 day extension of time to answer or move in response to this proceeding so that my client has the opportunity to retain California counsel in defense hereof.

I thank you in advance for your due consideration and approval hereof.

Stan

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Phone: (845) 600 - 8LAW (8529)
Facsimile: (845) 600 - 1LAW (1529)

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| New City, N.Y. 10956 | Poughkeepsie, N.Y. 12602 |

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From: schutzmanlaw@aol.com [<mailto:schutzmanlaw@aol.com>]
Sent: Friday, July 26, 2019 3:13 AM
To: Andrew Caine; Beth D. Dassa
Cc: jacob@adlersinsurance.com
Subject: In Re Woodbridge Group of Companies - USBC , District of Delaware / Case no 17-12560 (KJC)

Dear Mr. Caine:

I'm writing without prejudice further to my voice message. I write to confirm that I have been retained by Adlers Insurance Company with reference to your letter of July 12, 2019 on behalf of the Liquidating Trustee in respect of the above referenced matter, another copy of which is attached for your ease of reference..

My client appreciates that the Liquidating Trustee is interested in engaging in a discussion aimed at resolving the Trust's claim to recover from my client the sum of \$77,581.11 alleged as "Avoidable Amount" since 2012, and to thereby avoid attendant time and expense of litigation.

At the outset I mentioned my understanding that the records should show that my client's business dealings with Woodbridge was pursuant to court order and certainly without any fraudulent intent on my client's part, and that in order for my client to properly review and evaluate the Trust's Avoidable Amount claim request is hereby made that your office provide me with the details thereof separately broken down by designated assignee, annuity issuer, date, amount, etc.; this so that a detailed review can be undertaken by my client with a view towards providing a prompt and meaningful response.

Thanks. Stan

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Assistant: Diana E. Frailey

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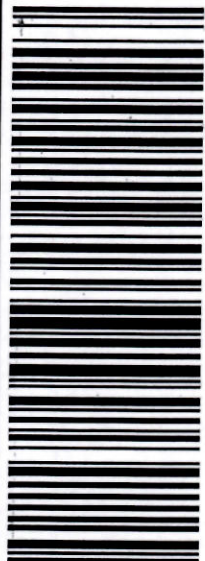
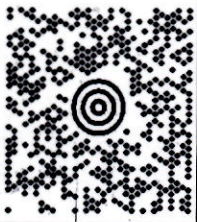
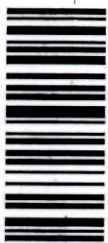
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